



January 3, 2017

VIA CM/ECF

The Honorable Edgardo Ramos
United States District Court
40 Foley Square
New York, NY 10007

Re: *Feldesman, et al. v. Interstate Hotels LLC*
Civil Action No. 1:16-cv-09352-ER

Dear Judge Ramos:

This firm represents Defendant Interstate Hotels LLC with respect to the above-referenced matter. Kindly accept this as Defendant's letter-motion seeking an extension of the deadline for Defendant to answer or otherwise respond to the Complaint. Pursuant to Section I(E) of Your Honor's individual motion practice and rules: (1) the Complaint was initially served on Defendant on December 15, 2016, making the deadline to answer the Complaint January 5, 2017; (2) there have been no previous requests for extensions or adjournments; (3) this brief extension is being sought due to the response time falling just after the end-of-year holiday period, and to give Defendant sufficient time to investigate the claims alleged; and (4) Plaintiffs have consented to this request to extend the deadline to January 31, 2017. Plaintiffs and Defendant agree that should the request for extension be granted, and should Defendant respond to the Complaint by filing a motion, the parties will confer and agree to a briefing schedule to be submitted to Your Honor for approval. Attached hereto as Exhibit A is a proposed consent order.

Thank you for your consideration of this request.

Respectfully submitted,

LECLAIRRYAN
A handwritten signature in blue ink, appearing to read "John E. Mancebo".
John E. Mancebo

cc: Davida S. Perry, Esq. (*via ECF*)

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